

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**
Reading Division

Richard Thomas Kontir,

Debtor.

Chapter 13

Case No. 23-11010-pmm

Motion to Reinstate Case

Debtor Richard Thomas Kontir, through his attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on April 6, 2023. He has filed a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b).

2. This case was dismissed on April 19, 2024, for failure to make plan payments.

3. As of the payment due on May 6, 2024, past-due payments owed to the Trustee total \$5,306.00.

4. The Debtor recently paid \$5,306.00 into his counsel's escrow account.

5. The Debtor requests that this case be reinstated.

6. Once this case is reinstated, the Debtor's counsel will promptly remit payment of the above funds to the Trustee.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: May 6, 2024

CIBIK LAW, P.C.
Attorney for Debtor

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